

**LARUSSO & CONWAY, LLP
ATTORNEYS AT LAW
300 OLD COUNTRY ROAD
SUITE 341 MINEOLA, NEW
YORK 11501**

Telephone No. (516) 248-3520

Facsimile No. (516) 248-3522

May 19, 2014

Electronically Filed

Honorable Arthur D. Spatt
United States District Court Judge
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Joseph Mirando
Criminal Docket No. 14-221(ADS)

Dear Judge Spatt:

Please accept this letter application requesting a modification of the travel restrictions imposed as part of the bail conditions on my client Joseph Mirando ("Mirando"), in the above-captioned case and permitting him to travel from May 24, 2014, to May 26, 2014, to attend the wedding of his god-daughter Danielle Ladimer in Catskill, New York. The wedding is scheduled for May 25, 2014.

On May 6, 2014, my client appeared before Magistrate Judge A. Kathleen Tomlinson ("Tomlinson") on the above-captioned indictment for arraignment, pled not guilty, and was released on a personal recognizance bond, with travel restricted to the Eastern and Southern Districts of New York. (See, Judge Tomlinson's order electronically filed as Document 25 in Case No. 14-221(ADS))

Mr. Mirando respectfully requests that the Court modify the defendant's bail conditions and permit him to travel from May 24 and 26, 2014, to attend the above-described wedding in Catskill, New York, a location outside the authorized district's for travel.

Assistant U.S. Attorney James Miskiewicz and Pre-Trial Service Officer Donna Mackey have no objection to our application.

Thank you very much for your consideration of this application.

Respectfully submitted,

Robert P. LaRusso

cc: James Miskiewicz, Esq.
Assistant U.S. Attorney
Eastern District of New York
610 Federal Plaza
Central Islip, New York 11722
(via ecf)

Donna Mackey
Pre-Trial Service Officer
Eastern District of New York
(via mail)